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February 6, 2023

Via E-Mail and ECF

Jeremy A. Lieberman, Esq.,
Pomerantz LLP,
600 3rd Avenue,
New York, NY 10016.

Re: *Patel v. Koninklijke Philips N.V. et al.*,
Case No. 1:21-cv-04606-ERK (E.D.N.Y.)

Dear Mr. Lieberman:

On behalf of Defendants Koninklijke Philips N.V., Frans van Houten, and Abhijit Bhattacharya (the “KPNV Defendants”), and in accordance with Rule IV(d)(i) of the Court’s Individual Practices and Rules, I enclose the following materials:

- (1) The KPNV Defendants’ Notice of Motion to Dismiss the Second Amended Complaint;
- (2) The KPNV Defendants’ Memorandum of Law in Support of Their Motion to Dismiss the Second Amended Complaint; and
- (3) Declaration of William B. Monahan in Support of the KPNV Defendants’ Motion to Dismiss the Second Amended Complaint and exhibits thereto.

Sincerely,

/s/ Sharon L. Nelles

Sharon L. Nelles

(Enclosures)

cc: *All Counsel of Record* (via e-mail) (without enclosures for ECF)